BEFORE THE
PUBLIC SERVICE COMMISSION OF WISCONSIN

Investigation of Area Code Relief for the 715 Area Code In Northern Wisconsin	**)** **)**	**05-TN-100**

AT&T Wisconsin's and AT&T Mobility's Comments On Area Code Relief for the 715 Area Code In Northern Wisconsin

I. Introduction and Background Information

Per the Commission's August 31, 2007 Notice of Investigation opening this docket, AT&T Wisconsin,[1] along with AT&T Mobility[2] (collectively, "AT&T") provides these comments on the 715 area code relief plan for northern Wisconsin.

On August 12, 2002, NeuStar, Inc. in its role as North American Numbering Plan Administrator ("NANPA") filed a Petition for area code relief for the 715 NPA. Based upon industry consensus reached in a meeting NANPA hosted on June 4, 2002, NANPA recommended implementation of an all-services distributed overlay relief plan for the 715 NPA. AT&T strongly supports the recommended distributed all-services overlay relief plan as the best alternative for area code relief for the 715 NPA. Although AT&T does not recommend a geographic split, we will also present the Company's views on the least disruptive geographic split alternatives. AT&T will also comment on the timing and implementation issues with respect to both types of relief plan.

II. AT&T's Supports Industry Recommendation for an All Services Overlay

AT&T supports the industry consensus recommendation for a distributed all-services overlay relief plan. This type of relief plan provides that the new overlay NPA would cover the exact same geographic area currently served by the 715 NPA. There are multiple advantages to an all-services overlay, including allowing customers to keep their current ten-digit phone numbers. Although an all-services overlay does require customers dial all ten

[1] Wisconsin Bell, Inc. now does business as "AT&T Wisconsin."

[2] AT&T Mobility (formerly known at Cingular) has the following legal entities operating in Wisconsin Milwaukee SMSA Limited Partnership, New Cingular Wireless PCS, LLC, and Madison SMSA Limited Partnership.

digits when placing a call to the geographic area currently covered by the 715 NPA, customers in other locations that have implemented an all services overlay have quickly adjusted to this requirement.

There are multiple advantages to implementing an all-services overlay. First, all customers would keep their existing telephone numbers. Second, overlays are the best long-term relief plan since future relief has minimal, if any, impact on customers. Third, an overlay would preserve the current geographic identity of the 715 NPA and simply add a second area code in the same geographic area. Fourth, an overlay does not divide existing communities of interest, such as school districts and local governments, with new area code boundaries. Fifth, an overlay results in a more efficient utilization of area codes, NXX codes and telephone numbers. Sixth, future overlay area code relief is even simpler to implement from a technical perspective. Seventh, an overlay can be implemented with a shorter lead-time than a geographic split.

On the other hand, with a geographic split, approximately 50% of customers would receive the new area code. Affected customers would have to notify friends and family of their new telephone numbers. For businesses, the consequences would be more significant. Businesses would be required to change their stationery, signage and advertising materials to reflect the new area code, changes which could be significantly expensive. With an overlay, however, these customers would not have to change their telephone number. In addition, with an overlay the potential for lost calls (and, therefore, lost business) because a customer dials the old number is eliminated. This includes eliminating misdialed calls not only from local customers but also from national and international locations. In sum, an overlay addresses the important customer need to keep their telephone numbers and avoid the costs and confusion associated with number changes.

It is important for the Commission to remember that adjustment to the new ten-digit dialing pattern is only required with the first overlay in a geographic area. Future overlay area code relief is seamless and essentially invisible to most customers. If necessary, another new area code is placed over the relevant geographic area. Again, current customers need not change their telephone number. By contrast, future split relief will always require a Commission decision on which communities should be split and which customers will become “losers” and require telephone number changes.

III. Efficient Use of Telephone Numbers, NXX Codes, and Area Codes

Overlays most efficiently use limited numbering resources. Overlays permit the assignment of numbering resources to the wire centers in the geographic areas where demand is growing at the fastest rate. As a larger geographic area is kept together with an all-services overlay, as opposed to an area code split, numbering resources can easily, and without disruption to customers, be allocated to where the demand has shifted.

A split makes the geographic area smaller, so there is a smaller area that numbering resources can be shifted and the new area code can be utilized only on one side of the split line. While the goal is to split the existing area code as equally as possible in terms of future demand for numbers the inability to accurately predict future growth patterns may result in one of the two area codes approaching exhaust again well before the other. One area code may have a shortage of available NXX codes or telephone numbers, while the other may have many unused NXX codes or telephone numbers. The result is the inefficient utilization of telephone numbers and NXX codes. Likewise, as additional relief is required for both split areas, two additional area codes are required for new split relief, while an efficient application of numbering resources through an overlay will only require one new area code over the existing geographic area.

Another principal advantage of an overlay is that it requires a much shorter lead-time for implementation. This advantage allows a greater opportunity to extend the life of the area code through number conservation, number pooling and code reclamation.

The cited disadvantage of an all-services overlay is that the FCC requires mandatory ten-digit dialing for all calls[3] within both the existing and overlay NPAs. Experience in other states like Illinois, Michigan and Ohio shows that customers adapt easily to ten-digit dialing. A well thought out implementation and education plan explaining the new dialing pattern to customers ameliorates this concern. Furthermore, it has been AT&T's experience in Houston and Dallas that, once an overlay has been implemented, subsequent relief in the form of another overlay plan has proven to cause less customer confusion than earlier splits.

IV. Overlay - Proposed Implementation Schedule for the 715 NPA

[3] 47 C.F.R. §52.19(c)(3)(ii).

AT&T believes that an overlay can be implemented in 15 months based on other NPA relief projects. Based on NANPA current projections, the 715 NPA is scheduled to exhaust in the 4th quarter 2009. In 2006, 21 codes were assigned, and 9 codes have already been assigned in 2007. As of September 6, 2007, there were 91 codes available for assignment. Based on the above trends, another 11 codes could be assigned by the end of 2007, leaving 80 codes available for assignment in 2008. If the above trends continue, AT&T would recommend that a trigger of 50 codes be set before implementation begins. This should still leave the industry enough time to complete the 15 month schedule.

There are several steps that go into a successful overlay; however, the key step is the establishment of the Permissive and Mandatory dialing dates. Current dialing patterns within the area code are maintained during the permissive dialing period, but customers also can begin dialing all calls with ten digits on a voluntary basis in order to become accustomed to this method of dialing before it becomes mandatory. Permissive ten-digit dialing is beneficial to customers because it allows them to modify their on-premise communications equipment and automatic dialers for ten-digit dialing well before the mandatory ten-digit dialing date.

Permissive ten-digit dialing is particularly helpful to alarm companies because it allows them a long lead time to modify alarm dialers on customer premises to dial ten digits for local calls to the central alarm reporting stations or emergency services. The industry recommends a permissive dialing period of six months, preceded by a period of up to 8 months in which carriers can make the programming changes necessary to implement permissive dialing.

The conversion to mandatory ten-digit dialing should occur at least one month prior to the first NXX codes being activated in the overlay NPA. It is preferable for the conversion to occur on a weekend; however, it should not occur on the weekend of any network-critical holiday, such as Mother's Day, because the heavy call volumes. For the same reason, mandatory ten-digit dialing should not be commenced if at all possible toward the end of the year. Also, because of the sheer amount of network programming required by carriers with multiple central office switches, and the finite supply of programmers, mandatory ten-digit dialing should not be implemented on the same weekend as any other mandatory dialing change.

V. The All-Services Overlay Presents the Best Solution for Customers in the 715 NPA

On balance, AT&T believes that the substantial benefits of an all-services overlay outweigh the disadvantages of mandatory ten-digit dialing and multiple area codes in the same geographic area. Customers adjust easily to the ten-digit dialing pattern and do not have to deal with the inconvenience of their numbers changing. Most significantly, subsequent overlay relief has minimal, if any, impact. In addition, because of planning and experience gained in preparing for overlays in numerous states, AT&T is aware of the steps necessary to ensure that an overlay in the 715 NPA would not impact 9-1-1 service.

Overlay relief plans are the predominate type of plans being implemented today. Two-thirds of relief plans currently being implemented are overlay plans. Attachment A is a map showing the twenty-two states that have either already implemented or are in the process of implementing overlay relief plans.[4] The states with the blue circles currently have overlay area codes. The first number in a circle represents the number of area codes involved in overlays. If a second number is shown, it depicts the number of area codes involved with overlay relief plans being implemented. The states with the pink circles are those with no current overlay area codes in service, but overlay relief plans are approved.

Further, there is precedent for an overlay relief plan to be implemented in an area code that covers a significant portion of a state's geography, such as the 715 Area Code. Attachment B provides some examples of such current and planned overlay relief plans:

- Attachment B-1 – Maryland: More than a decade ago the State of Maryland implemented overlay Area Codes across the entire state and is now in the process of implementing a third Area Code in each geography.
- Attachment B-2 – Mississippi: The Southern half of the State, except a small portion along the Gulf coast, has an overlay Area Code in place.
- Attachment B-3 – Washington: An overlay area code relief plan is approved for the 360 area code which covers the Western half of the State, except for the Seattle metropolitan area.
- Attachment B-4 – Alabama: An overlay area code relief plan is approved for the 205 Area Code which covers the West Central portion of the State.

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[4] Map data from the NANPA web site.

Finally, while these comments are specific to the Commission's review of a relief plan for the 715 Area Code, the Commission is also reviewing relief plans for the 920 Area Code (Docket 05-TN-106). The Industry's recommendation for relief in the 920 Area Code is also an all-services overlay solution. This affords the Commission the unique opportunity to set forward looking policy, i.e. approval of overlay area code plans for both 715 and 920 Area Codes, that would be planned and implemented in the vast majority of the State.[5,]

VI. .Geographic Split Alternatives

AT&T supports the all-services overlay as the preferred area code relief for the 715 NPA. Previously the perceived principal advantages of a geographic split are that there is only one area code serving a discrete geographic area and seven-digit local dialing is preserved within that area code. However, these advantages are becoming less significant as numerous new area codes have been implemented nationwide, the pervasiveness of toll-free 800 services, and the use of wireless phones,[6] have accustomed customers to dialing ten digits for an ever-increasing percentage of their calls. As geographic splits divide geographic areas and further split communities, more and more customers will need to learn and dial the area codes to reach businesses and friends in other area codes.

A geographic split has disadvantages for customers, communities, and the industry. Because approximately 50% of customers receive a new area code, those customers must shoulder various burdens. Businesses must change their stationery, signage and advertising materials and notify their customers of their new telephone numbers. Residential customers must notify their friends and relatives of their new numbers. The new area code boundaries may divide existing communities of interest, and drawing these boundaries (as well as deciding who gets to keep the existing area code) can be a contentious and politically

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[5] AT&T is not suggesting that relief plans be implemented simultaneously in both 715 and 920. Both relief plans will have their own schedule, but the policy decision on the type of relief could be made at the same time. It should be noted that while the 262 Area Code is the result of a geographic split of 414, there is a significant amount of 10 digit local dialing between 262 and 414. The heavily populated 262 areas of Eastern Waukesha County, Southern Ozaukee County and Northern Racine County are all in the Milwaukee local calling plan. Plus, many households in 262 areas retained cell phones with the 414 area code either because they were acquired prior to the split, or are provided to members of the household by their employer. This adds to the level of 10 digit local calling volumes.

divisive process. A geographic split is more time-consuming for the industry to implement and may lead to an inefficient use of numbers if the demand for NXX codes grows at different rates in the two area codes. In addition, to implement the split, 9-1-1 service providers must make substantial database and 9-1-1 network changes, and coordinate those changes with all wireline and wireless carriers in the NPA. Finally, a geographic split requires a longer lead-time than an overlay.

In the event the Commission should decide to implement a geographic split, however, it should ensure that the split is approved and announced to the industry and the public, with a fixed implementation date, at least twenty-one months prior to final implementation. Geographic splits have been implemented in shorter time frames in emergency circumstances, but this increases the risk of service disruptions and causes greater inconvenience to the public.

A long lead-time is necessary for several reasons. First, approximately 50% of the customers in the existing area code will receive the new area code. These customers include businesses; governmental bodies; community, religious and social organizations; and individual customers. These entities and individuals deserve as much lead-time as possible to work off their existing inventories of stationery and advertising materials that contain the old area code, to modify their signage, and otherwise to prepare for the new area code. Because customers are immediately affected when the area code is announced and need to know the final implementation date at the commencement of the process, the announcement of an area code split should be considered irreversible.

Second, once the new area code and its boundaries are announced, telecommunications carriers and paging companies must reprogram their central office switches to recognize the new area code and to route calls dialed using that area code to the appropriate customer. For incumbent LECs and other carriers with multiple switches, this network provisioning work easily can take at least several months.

Third, once the initial reprogramming is complete, there must be a permissive dialing period in the geographic area served by the new area code during which calls will be completed whether the customer dials the old area code or the new area code. During this permissive dialing period, customers must reprogram their PBXs, automatic dialers and other equipment for the new area code, alarm companies must reprogram their alarm dialers on

customer premises, and wireless carriers must reprogram their customers' handsets. To avoid service disruptions and potentially adverse consequences, the permissive dialing period needs to be at least six months.

Fourth, once the new area code is fully implemented for a split relief plan, there should be a several month aging period before numbers are assigned in the new area code that duplicate the same seven-digit number in the old area code. Likewise, this same aging process is required prior to reassigning numbers in the old area code that duplicate the same seven-digit number in the new area code. The aging period is necessary to cut down on the number of misdialed calls that inevitably occur when customers in the new area code attempt to place calls into the old area code without dialing the area code.

VII. Guidelines for the Boundary Line for a Geographic Split

There are a number of objectives in establishing the boundary line between the existing and new area codes. First, the boundary line should conform to existing wire center and rate center boundaries to minimize the number of customers who might be required to accept a change in the seven-digit (prefix and suffix) portion of their telephone number. Second, to the extent possible, the boundary line should conform to natural and jurisdictional boundaries to avoid splitting municipalities and other communities of interest. As noted, the process of identifying such boundaries can be politically controversial and time consuming. Third, the boundary should be established so that the projected future life of both area codes is approximately the same. Compliance with this objective results in a more efficient utilization of numbers and maximizes the time period before any customers would be subjected to yet another area code relief plan. Fourth, customers who must take number changes as a result of area code relief should not be required to change their numbers again for eight to ten years per industry guidelines. Therefore, the projected life of each split area should be a minimum of eight to ten years. Fifth, in an area code served by numerous local exchange carriers, such as 715, an effort should be made to avoid splitting the contiguous serving areas of individual carriers or disrupting local and extended area calling plans.

From AT&T's perspective, if an area code split is adopted, AT&T would prefer Alternative 2 – as identified in the Notice of Investigation -- is the least disruptive to customers and the company's network. This split plan conforms best to existing LATA, wire center and rate center boundaries, and the projected lives of the areas are within NANPA

guidelines, according to its most recent projection. This alternative also was the industry's choice among the split alternatives.

CONCLUSION

AT&T encourages the Commission to adopt the Industry's recommendation of an all-services overlay as the relief plan for the 715 Area Code. On balance, this plan will provide the least impact to the customers in the area. No customer's telephone number will change. The new area code will be introduced into a given exchange as demand for numbers requires its introduction. The impact of introducing mandatory 10-digit dialing of all local calls will fade with time, just as it did with the transition from 5-digit local community dialing to the current 7-digit local dialing plan.

Respectfully submitted,

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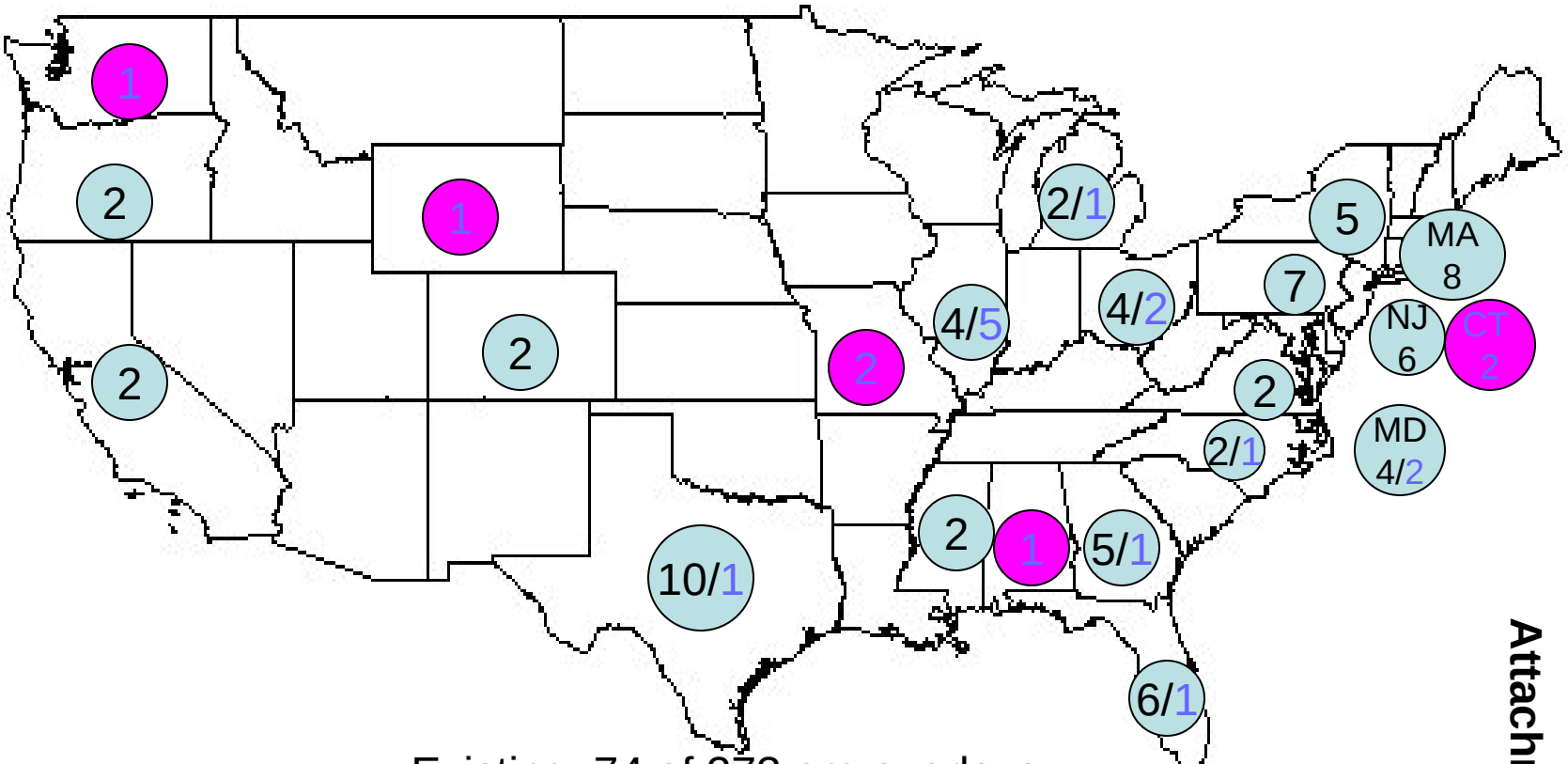
States With Overlay Area Codes

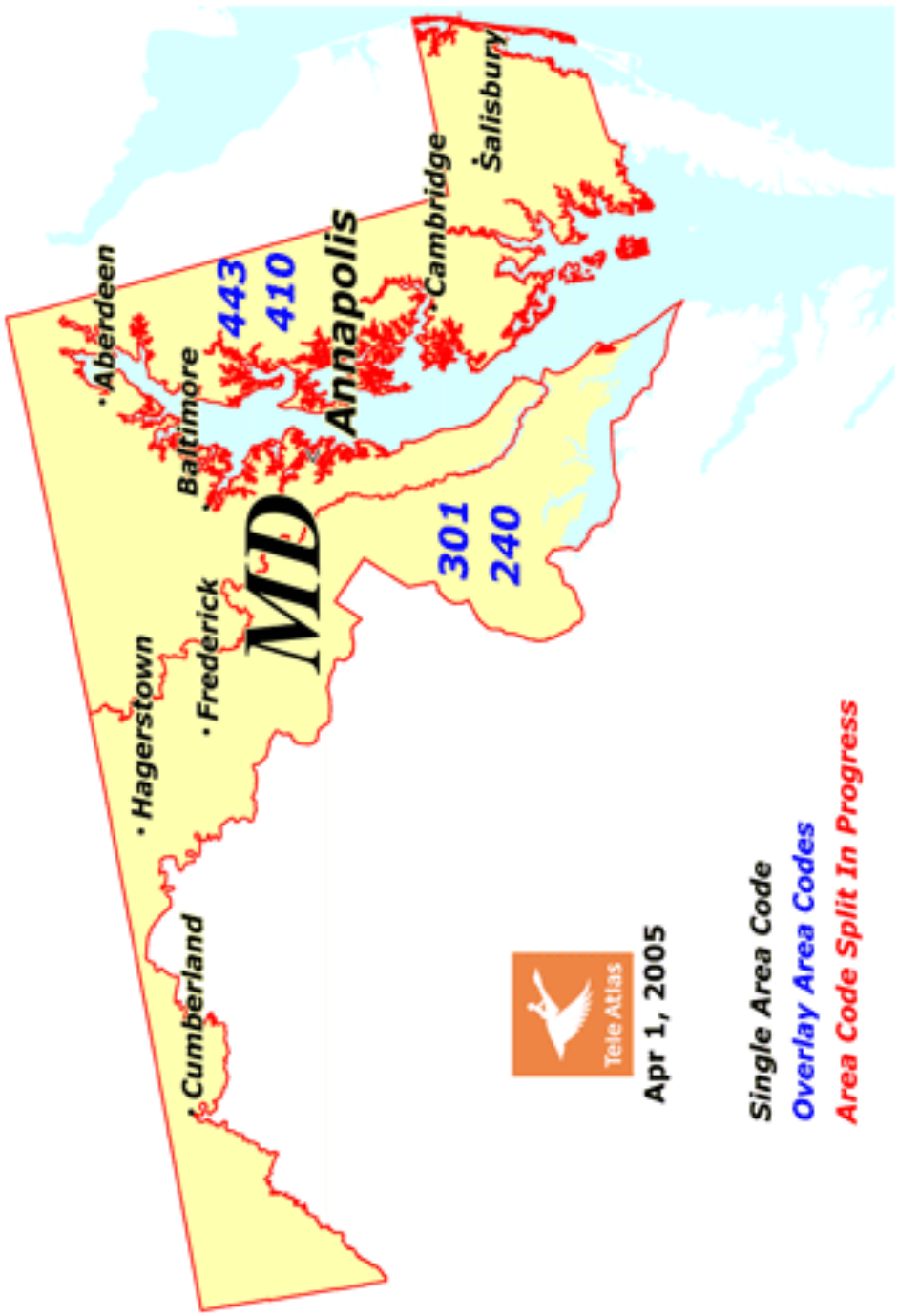


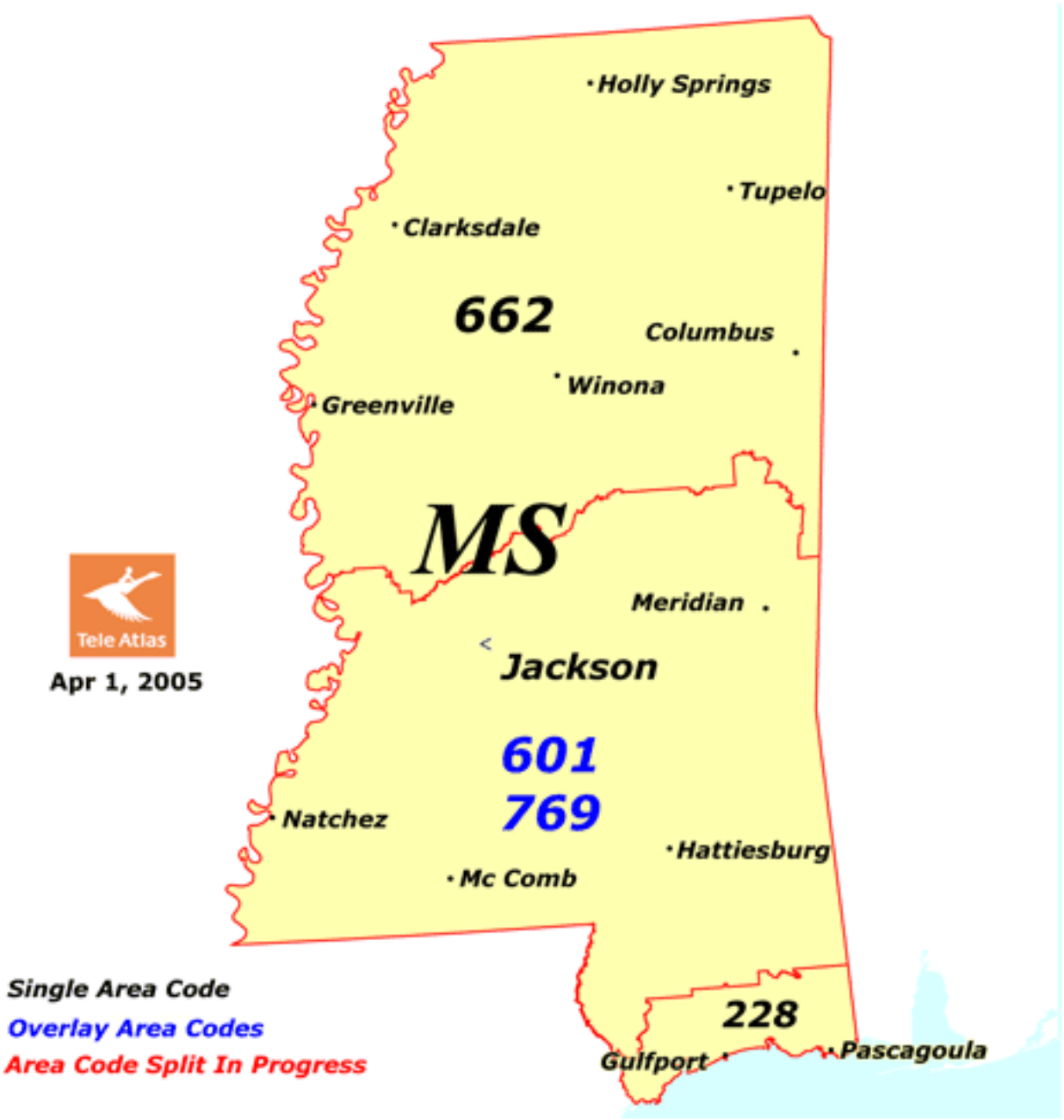
Existing: 74 of 273 are overlays

Planned: 21 of 33 are overlays

Attachment A

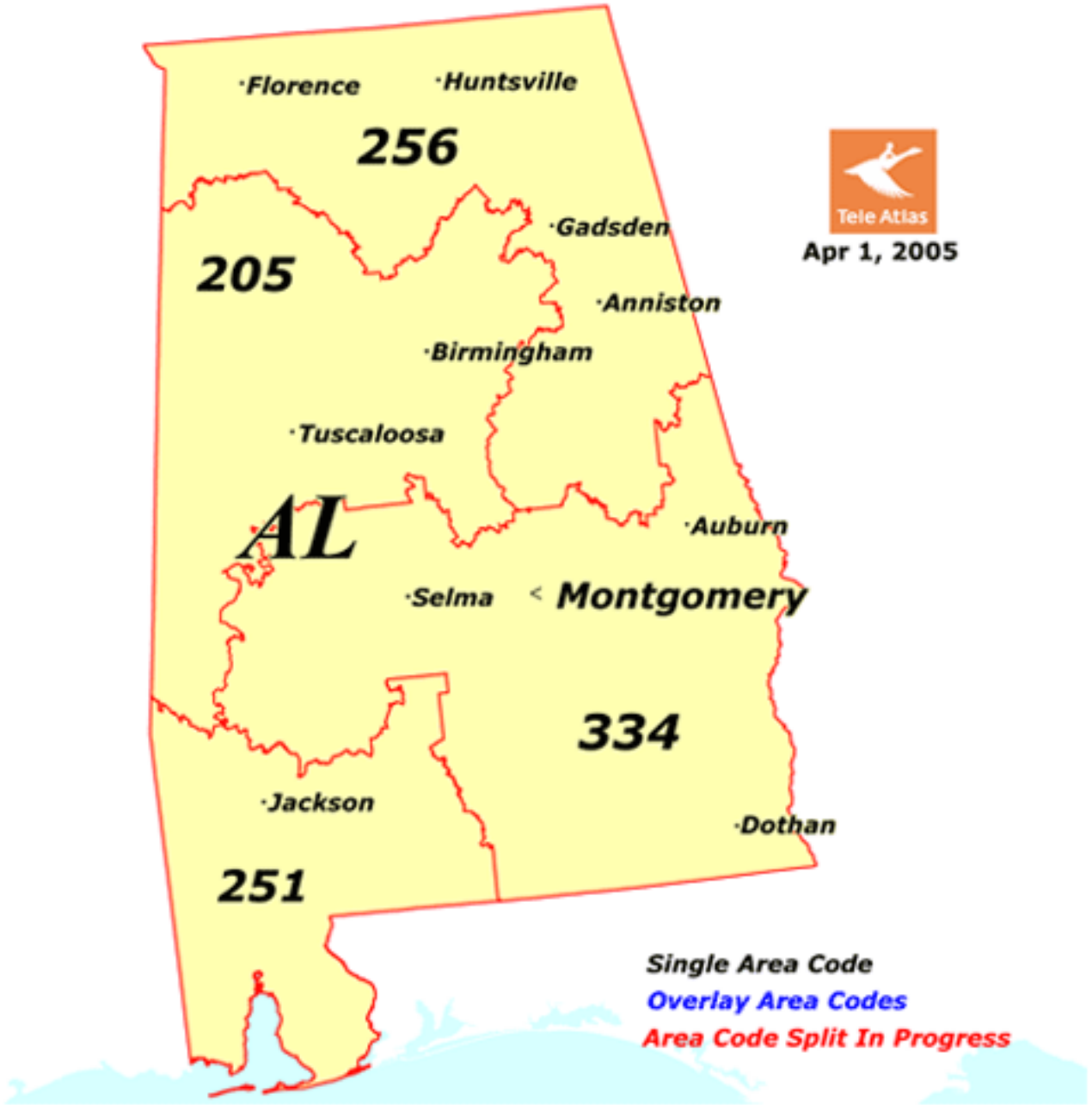
Attachment B-1





Attachment B-2

Attachment B-3



Attachment B-4